

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

JAMES RUSSELL MILLER,  
*Plaintiff*

VS.

MANAGEMENT & TRAINING  
CORPORATION, *et al.*,  
*Defendants*

**Civil Action No. 3:14-cv-000427-HTW-LRA**

## UNOPPOSED MOTION FOR ADDITIONAL TIME TO FILE RESPONSE

**COMES NOW** Defendant Management & Training Corporation (“MTC”), through counsel and pursuant to the Federal Rules of Civil Procedure, and files this Unopposed Motion for Additional Time to File Response as follows:

1. Plaintiff filed his Motion for Sanctions under Rule 11(b) on December 28, 2018. Under L.U. Civ. R. 7(b)(4), MTC has 14 days to file a response to this motion, which would make said response due on or before January 11, 2019.

2. Plaintiff and his counsel have again charged MTC's counsel with serious accusations, this time under Federal Rule of Civil Procedure 11(b), which require significant time to prepare a thorough and accurate response. In addition, due to the recent holiday season and undersigned counsel's wedding and subsequent honeymoon from January 6, 2019 through January 13, 2019, additional time is needed to prepare the response to this motion. Therefore, while MTC and its counsel completely deny the accusations in the motion, MTC requests an additional week in which to file a response. That would make the response due on or before the close of business of January 18, 2019.

3. This Motion is not being filed for the purpose of delay, but is in the interest of justice. Furthermore, Plaintiff's counsel does not oppose the requested extension. Due to the straightforward nature of this request, MTC requests waiver of the filing of a separate memorandum of authorities.

WHEREFORE, PREMISES CONSIDERED, Defendant MTC respectfully requests that the Court enter an order extending its response time to Plaintiff's Motion for Sanctions up through, and including, January 18, 2019.

Dated: January 4, 2019.

Respectfully submitted,

**MANAGEMENT & TRAINING CORPORATION**

By: s/ R. Jarrad Garner  
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**CERTIFICATE OF SERVICE**

I, R. Jarrad Garner, one of the attorneys for the Defendant Management & Training Corporation, do hereby certify that I have, this day, filed the foregoing with the Clerk of Court via the CM/ECF system, which has caused a true and correct copy to be served by electronic mail on all counsel of record.

Dated: January 4, 2019.

*s/ R. Jarrad Garner*

R. Jarrad Garner